



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 27, 2018

Andrew M. Martin Co., NV Inc.
c/o Ann Tillman
Pyxis Regulatory Consulting Inc.
4410 136th St. Ct. NW
Gig Harbor, WA 98332

Subject: Label Amendment – formatting changes and editing
Product Name: LIBERTY 55 PLUS IGR SPOT-ON FOR CATS
EPA Registration Number: 75844-10
Application Date: April 26, 2018
Decision Number: 540990

Dear Ms. Tillman:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Helen Hull-Sanders by phone at 703-347-0243, or via email at hull-sanders.helen@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is cursive and somewhat stylized, with the first letters of the first and last names being capitalized and prominent.

Elizabeth Fertich
Product Manager 04
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

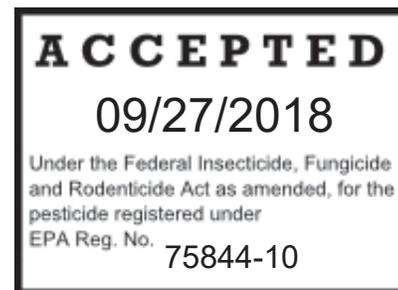
{Note to reviewer: [Text] in brackets designates optional language. {Text} in braces denotes where in the final labeling text will appear, notes to reviewer or directional information.}

{FRONT CARTON PANEL TEXT}

LIBERTY 55 PLUS IGR SPOT-ON FOR CATS

{Final Label-the word Cat will be at least 75% in height of the largest letter in the primary brand name.}
{Final Label will include a large clear picture of a cat in the respective weight range on the front panel of the label}

[Only for [use on][smaller] cats & kittens 12 weeks and older weighing 3 to 5 lbs.]
[Only for [use on][larger] cats [& kittens] 12 weeks and older weighing over 6 lbs]
[For use ONLY on [smaller] cats & kittens 12 weeks or older weighing 3 to 5 lbs]
[For use ONLY on [larger] cats [& kittens] 12 weeks or older weighing over 6 lbs]
[See Optional Marketing Claims]



ACTIVE INGREDIENTS:

Etofenprox55.0%

Pyriproxyfen.....2.2%

OTHER INGREDIENTS:.....42.8%

TOTAL100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See back panel for additional Precautionary Statements, Directions for Use and First Aid
READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

Manufactured for:

Andrew M. Martin Co., NV Inc.
707 Spirit 40 Park Drive, Suite 150
St. Louis MO 63005

EPA Registration No. 75844-10

EPA Establishment No.

Net Contents: [for (smaller) cats [and][&] kittens 12 weeks or older and 3 to 5 lbs]

[0.024 fl. oz.] [(0.7 mL)] [1] [One] tube

[0.048 fl. oz.] [1.4 mL] [2][Two] tubes, each [0.024 fl. oz.] [(0.7 mL)]

[0.072 fl. oz.] [2.1 mL] [3][Three] tubes, each [0.024 fl. oz.] [(0.7 mL)]

[0.096 fl. oz.] [2.8 mL] [Contains [4] [Four] tubes each [0.024 fl. oz.] [(0.7 mL)]

[0.12 fl. oz.] [3.5 mL] [Contains [5] [Five] tubes, each [0.024 fl. oz.] [(0.7 mL)]

[0.144 fl. oz.] [4.2 mL] [Contains [6] [Six] tubes, each [0.024 fl. oz.] [(0.7 mL)]

[0.192 fl. oz.] [5.6 mL] [Contains [8] [Eight] tubes, each [0.024 fl. oz.] [(0.7 mL)]

[0.288 fl. oz.] [8.4 mL] [Contains [12] [Twelve] tubes, each [0.024 fl. oz.] [(0.7 mL)]

Net Contents: [for (larger) cats [[and][&] kittens] 12 weeks or older over 6 lbs]

[0.047 fl. oz.] [(1.4 mL)] [1] [One] tube

[0.094 fl. oz.] [2.8 mL] [2][Two] tubes, each [0.047 fl. oz.] [(1.4 mL)]

[0.14 fl. oz.] [4.2 mL] [3] [Three] tubes, each [0.047 fl. oz.] [(1.4 mL)]

[0.188 fl. oz.] [5.6 mL] [Contains [4] [Four] tubes, each [0.047 fl. oz.] [(1.4 mL)]

[0.235 fl. oz.] [7.0 mL] [Contains [5] [Five] tubes, each [0.047 fl. oz.] [(1.4 mL)]

[0.282 fl. oz.] [8.4 mL] [Contains [6] [Six] tubes, each [0.047 fl. oz.] [(1.4 mL)]

[0.376 fl. oz.] [11.2 mL] [Contains [8] [Eight] tubes, each [0.047 fl. oz.] [(1.4 mL)]

[0.564 fl. oz.] [16.8 mL] [Contains [12] [Twelve] tubes, each [0.047 fl. oz.] [(1.4 mL)]

[Contains a [one][1] month supply] [two][2] [three][3] [four][4] [five][5] [six][6] [eight][8] [twelve][12] month[s] supply]

[Package contains a [one][1] month supply] [two][2], [three][3], [four][4], [five][5], [six][6], [eight][8], [twelve][12] month supply]

[Save Now!] [Value Size] [Club Size] [Bonus Size] [Club Pack] [Great Value] [Better Value] [Bonus Pack] [3 + 1 bonus pack!]

[4 + 1 bonus pack!] [5 + 1 bonus pack!] [Buy more and save!] [Buy 3 get 1 free] [Buy 4 get 1 free] [Buy 5 get 1 free] [33%

(More) (Free)!] [25% (More) (Free)!] [20% (More) (Free)!] [1 Dose Free!] [1 Month Treatment Free!] [30 Day Treatment- Free!]

{If a package contains bonus/free content the appropriate net contents statement will not be different from what is listed. For example, for the statement "buy 3 get 1 free" the carton contains 4 tubes and the net contents for a 4 tube package will be used.}

{SIDE PANELS 1 and 2}
LIBERTY 55 PLUS IGR SPOT-ON FOR CATS
[Optional Marketing Claim(s)]

{TOP SIDE PANEL 3 (TOP)}
LIBERTY 55 PLUS IGR SPOT-ON FOR CATS
[Optional Marketing Claim(s)]

{SIDE PANEL 4 (BOTTOM)}
[Bar Code]
[©2018 Andrew M. Martin Co., NV Inc.]
Lot number {only number will appear}

{BACK CARTON PANEL}
LIBERTY 55 PLUS IGR SPOT-ON FOR CATS

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Hazards to Humans: Causes moderate eye irritation. Avoid contact with eyes and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Repeated exposure to etofenprox can cause skin irritation.

Hazards to Domestic Animals: For external use on cats only. Individual sensitivities, while rare, may occur after using any pesticide product on cats. Certain medications can interact with pesticides. Do not treat your cat with more than one pesticide product at a time. This product is not a substitute for prescribed heartworm preventative. Over dosing your cat can result in serious illness and even death. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant, or nursing cats. Consult a veterinarian before using on cats with known organ dysfunction.

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses after the first 5 minutes, then continue rinsing.• Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns), you may call the Rocky Mountain Poison Center at 1-303-389-1883 twenty-four [24] hours per day, seven [7] days per week.	

PHYSICAL OR CHEMICAL HAZARDS: Combustible. Do not use or store near heat or open flame. Do not mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
DO NOT ALLOW CHILDREN TO APPLY PRODUCT. TO PREVENT HARM TO YOU AND YOUR CAT
READ ENTIRE LABEL BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY.

Restrictions

Do not use on animals other than cats. Do not allow your cat to ingest this product. Do not use on kittens under 12 weeks of age. Do not apply to cats weighing less than [3][5] lbs. Do not apply more than one tube per treatment for one cat regardless of cat's weight. Do not get this product in your cat's eyes or mouth. Do not apply more often than once every [30 days][4 weeks][month]. Do not bathe cat within the first 24 hours after this product has been applied. Households with more than one cat should not allow cats to groom each other until solution has dried.

{The following text in a box will be placed in the lower right hand corner of back panel.}

Side Effects: Monitor your cat after application. [Some cats may experience temporary startle effects when any product is applied.] Cats may experience some temporary irritation at the site of product application such as redness, scratching, rash, hair discoloration or hair loss or other signs of discomfort. If signs of sensitivity occur, bathe your cat with a mild soap and rinse with large amounts of water. If these or other side effects occur, consult your veterinarian or call 1-303-389-1883. If your cat has an unusual reaction to the initial application, consult a veterinarian before repeating application. The most common signs of incidental ingestion are excessive salivation and foaming at the mouth. If these symptoms occur, immediately feed your cat as it may reduce symptoms and continue to monitor your cat for the next 24 hours.

HOW TO APPLY:

{Package for cats weighing 3 to 5 lbs. and 12 weeks or older}

Do not apply this product to cats weighing less than 3 lbs or under 12 weeks of age. Apply 0.7 mL of Liberty 55 Plus IGR Spot-On for Cats to a spot high on the back of the cat's neck behind its head.

Hold tube in upright position pointing away from user's and cat's face and body. Break off tip or cut with scissors. Part cat's hair on the neck behind its head. Apply [Liberty 55 Plus IGR Spot-On for Cats] [this product] by gently squeezing the tube. Apply the entire contents of the tube to the skin on the cat's neck behind its head. Hold the cat for a few seconds to give the solution time to be absorbed into the cat's coat.

{Package for cats weighing over 6 lbs and 12 weeks or older}

Do not apply this product to cats weighing less than 6 lbs or under 12 weeks of age.

Apply 1.4 mL of Liberty 55 Plus IGR Spot-On for Cats as a spot or stripe, starting high on the back of the cat's neck to in front of the shoulder blades.

Hold tube in upright position pointing away from user's and cat's face and body. Break off tip or cut with scissors. Part cat's hair on the neck behind its head. Apply [Liberty 55 Plus IGR Spot-On for Cats] [this product] by gently squeezing the tube. Apply the entire contents of the tube to the skin on the cat's neck behind its head. Hold the cat for a few seconds to give the solution time to be absorbed into the cat's coat.

[Optional pictogram for opening tube]

[Optional pictogram for applying product to cat]

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE: Store in a cool (below 25°C), dry place, away from heat or open flame, in an area that is inaccessible to children and animals. Do not refrigerate. Protect from direct sunlight.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[WARRANTY]

[Andrew M. Martin Co., NV Inc., warrants that this product conforms to the chemical description on the label. Andrew M. Martin Co., NV Inc., neither makes nor authorizes any agent or representative to make any other warranty or fitness or merchantability, guarantee or representation, express or implied, concerning this material. To the extent consistent with applicable law Andrew M. Martin Co., NV Inc.'s maximum liability for breach of this warranty shall not exceed the purchase price of this product. To the extent consistent with applicable law Buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this product which extend beyond the use of the product under normal conditions and in accord with statements made on the label.]

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{TEXT FOR TUBE}

{Tube panel text}

LIBERTY 55 PLUS IGR SPOT-ON FOR CATS

For use on cats & kittens [3-5 lbs] [over 6 lbs] and over 12 wks

Etofenprox 55%

Pyriproxyfen 2.2%

EPA Reg. No. 75844-10

[0.024 fl. oz. (0.7 mL)] [0.047 fl. oz. (1.4 mL)]

KEEP OUT OF REACH OF CHILDREN

CAUTION. Read entire label before use.

Lot number {only number will appear}

{OPTIONAL MARKETING CLAIMS}

1. Fleas • Ticks • Mosquitoes
2. Kills [three][3] different kinds of pests on cats [[and][&] kittens][:][-] Fleas, Ticks, & Mosquitoes
3. Kills [three][3] different feline pests[:][-] Fleas, Ticks, & Mosquitoes
4. Improved formula
5. IGR – Insect Growth Regulator
6. Provides Monthly [4 Weeks][30 Days] Protection
7. Reapply Once a Month
8. Repels mosquitoes [for up to [30 days][4 weeks][1 month]
9. Breaks the Flea Life Cycle For Up To [3 Months][12 Weeks][90 Days]
10. Kills Adult Fleas For Up To [30 Days][4 Weeks][1 Month] [Per Application]
11. Kills Flea Eggs and Flea Larvae For Up To [3 Months] [90 Days] [12 Weeks] [Per Application]
12. Kills Fleas, [Deer][Or][Black Legged] Ticks, Flea Eggs and Larvae
13. [Kills Fleas, [Deer][Or][Black Legged] Ticks For Up To [4 Weeks] [1 Month] [30 Days] [Per Application]
14. Kills [Deer][Or][Black Legged] Ticks For Up To [30 Days] [4 Weeks] [1 Month] [Per Application]
15. Monthly Protection from Flea, [Deer][Or][Black Legged] Tick, Mosquito, And Flea Egg And Larvae Infestations
16. Protects 5 Ways[:][-] Kills fleas, [Deer][or][Black Legged] Ticks, Flea Eggs & Larvae, and repels mosquitoes
17. Prevents Flea Eggs From Developing Into Biting Adults For Up To [90 Days][3 Months] [Per Application]
18. Kills [Deer][Or][Black Legged] Ticks That May Transmit Lyme Disease, For Up To [4 Weeks][1 Month][30 days] [Per Application]
19. Prevents Mosquitoes [That May Transmit West Nile Virus] From Feeding On Cats For Up To [One Month][30 days][4 weeks] [per application]
20. A squeeze-on that leaves no oily residue
21. Cats can't rub off on furniture leaving oily residue behind.
22. No oily residue [on your cat's coat]
23. Quick drying
24. [Dries quickly] [Quick-drying formula] [Quick-Drying]
25. Squeeze-On. Stays on and doesn't rub off
26. Spreads using the cats natural skin oils
27. Kills [and repels] mosquitoes that may transmit heartworm
28. Kills fleas that may cause flea allergy dermatitis, flea bite anemia, and tapeworm infestation
29. Monthly Flea, Tick and Mosquito Treatment
30. Easy to Use tube
31. No-mess tube
32. ONLY for [smaller] cats & kittens 3 to 5 lbs & 12 weeks or older
33. ONLY for [larger] cats [& kittens] over 6 lbs. [and] [&] over & 12 weeks or older
34. Kills, repels and prevents re-infestation of fleas for up to [30 days] [4 weeks] [1 month]
35. Kills flea eggs and larvae for up to [90 days] [3 months] [12 weeks]
36. Breaks the flea life cycle for up to [3 months] [90 days] [12 weeks]
37. Kills, repels and prevents re-infestation of [Deer][or][Black legged] ticks for up to [30 days] [4 weeks] [1 month]
38. Kills or repels mosquitoes on cats [[and][&] kittens][for up to 30 days] [4 weeks][1 month]
39. Protects 4 ways Kills fleas, [Deer][or][Black Legged] ticks, Flea Eggs & Larvae, and repels mosquitoes
40. Kills [four][4] different kinds of pests on cats [[and][&] kittens][:][-] fleas • ticks • Flea Eggs & Larvae • mosquitoes
41. 4 ways Protection from pests[:][-] fleas • ticks • Flea Eggs & Larvae • mosquitoes
42. fleas • ticks • Flea Eggs & Larvae • mosquitoes
43. Kills 3 Different Kinds of Pests on Cats! Fleas, Ticks, & Mosquitoes
44. Prevents Reinfestation! Fleas • Ticks • Mosquitoes

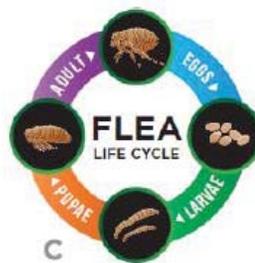
- 45. Improved Technology
- 46. [Odorless] [unscented] [fragrance free]
- 47. Optional pictogram for pests
- 48. Optional pictogram for opening tube
- 49. Optional pictogram for applying product to cat
- 50. Optional pictogram of flea, flea eggs, flea larvae, ticks, mosquitoes
- 51. Optional pictogram of tube



A



B



C



D